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15 *Attorneys for Plaintiffs Modern Eminence LLC,*
16 *Modern Fortress, Inc. and AllRealms Inc.*

17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 MODERN EMINENCE, LLC, MODERN
20 FORTRESS, INC., AND ALLREALMS,
INC.

Case No.: 2:24-cv-00348-CDS-EJY

22 Plaintiffs,

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR PLAINTIFFS
TO RESPOND TO DEFENDANT'S
MOTION TO DISMISS AMENDED
COMPLAINT AND DEFENDANT'S
MOTION TO STAY CASE (FIRST
REQUEST)**

23 vs.

24 NATHAN PARK

25 Defendant.

1 Plaintiffs Modern Eminence LLC, Modern Fortress, Inc., and AllRealms, Inc.
 2 (“Plaintiffs”), by and through their counsel of record, John P. Desmond, Esq. with the law firm
 3 of Dickinson Wright PLLC, and Defendant Nathan Park (“Park”) by and through his counsel of
 4 record, Jarrod L. Rickard, Esq. and Katie L. Cannata, Esq. with the law firm of Semenza Rickard
 5 Law, (together, the “Parties”) hereby stipulate and agree, subject to this Court’s approval, as
 6 follows:

7 WHEREAS, Park filed his Motion to Dismiss Amended Complaint [ECF 16] and his
 8 Motion to Stay Case [ECF 17] on May 20, 2024;

9 WHEREAS, on May 20, 2024, the Court ordered Plaintiffs to respond to those motions
 10 by June 3, 2024;

11 WHEREAS, Park has agreed to provide Plaintiffs up to and including June 6, 2024 to
 12 respond to his Motion to Dismiss Amended Complaint and his Motion to Stay Case; and

13 WHEREAS, this is the first request filed with this Court to extend the time for the
 14 Plaintiffs to respond to Park’s Motion to Dismiss Amended Complaint and his Motion to Stay
 15 Case and Plaintiffs have requested the extension in good faith and not to delay this matter.

16 ACCORDINGLY, the Parties hereby request that the Court grant this Stipulation to
 17 extend the deadline for Plaintiffs to file responses to Park’s Motion to Dismiss Amended
 18 Complaint and Motion to Stay Case to June 6, 2024.

19 This Stipulation is made in good faith and is not made for the purpose of delay. The
 20 Parties agree that good cause exists for this continuance.

21 DATED this 30th day of May, 2024

22 DICKINSON WRIGHT PLLC

23 /s/ John P. Desmond

24 John P. Desmond, Esq., Bar No. 5618
 25 100 West Liberty Street, Suite 940
 26 Reno, Nevada 89501

27 Attorney for Plaintiffs

21 DATED this 30th day of May, 2024

22 SEMENZA RICKARD LAW

23 /s/ Jarrod L. Rickard

24 Jarrod L. Rickard, Esq., Bar No. 10203
 25 Katie L. Cannata, Esq., Bar No. 14848
 26 10161 Park Run Drive, Suite 150
 27 Las Vegas, Nevada 89145

28 Attorneys for Defendant Nathan Park

1 **ORDER**
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IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE
DATED: May 30, 2024

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